

EXHIBIT A

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

THE HONORABLE KENNETH M. HOYT, JUDGE PRESIDING

KONNECH, INC.,) Cause No. 4:22-cv-03096
)
Plaintiff,)
)
vs.)
)
TRUE THE VOTE, et al.,)
)
Defendants.)
)

HEARING

OFFICIAL COURT REPORTER'S TRANSCRIPT

Houston, Texas

October 27, 2022

APPEARANCES:

On behalf of the Plaintiff:

Constantine Z. Pamphilis, Esq.

Nathan Richardson, Esq.

On behalf of the Defendants:

Brock Cordt Akers, Esq. (Not present)

Michael John Wynne, Esq

John C. Kiyonaga, Esq.

Reported By: Nichole Forrest, CSR, RDR, CRR, CRC
Certified Realtime Reporter
United States District Court
Southern District of Texas

Proceedings recorded by mechanical stenography.
Transcript produced by Reporter on computer.

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1 around and trying to find things. But we also do
2 geospatial research.

3 THE COURT: Were you planning to put the
4 names of the individuals who worked for the Harris
5 County polling, Bexar County polling, all of that data
6 that you said that you saw, were you planning to post
7 that data on a public venue?

8 THE WITNESS: No, sir.

9 THE COURT: Does this sound familiar to
10 you: Gregg and Catherine, GC -- that's you, Gregg and
11 Catherine -- stumbled onto voting software used to
12 corroborate elections. Was left with default
13 password.

14 What is a default password?

15 THE WITNESS: A password that the software
16 would be shipped with.

17 THE COURT: Is what?

18 THE WITNESS: When they ship it to be
19 installed.

20 THE COURT: That means that someone has
21 intercepted a password?

22 THE WITNESS: No, sir. It ships with the
23 password. I think that is what it's referring to.

24 THE COURT: No. I'm asking you what
25 you're referring to.

1 It says here: You were left with -- you
2 used to coordinate the elections, was left with
3 default password of database.

4 What are you talking about?

5 THE WITNESS: Like I said, a password that
6 would be shipped with the software.

7 THE COURT: And so the software you're
8 referring to is what?

9 THE WITNESS: I don't recall. I mean,
10 do --

11 THE COURT: We're talking about this
12 software. We're talking about this data.

13 THE WITNESS: Well, I don't know that we
14 are or aren't. We could be talking about the
15 Open.INK.

16 THE COURT: But you're the one talking
17 about it.

18 THE WITNESS: Right. But I don't know if
19 that's what I was referring to.

20 THE COURT: Well, you said you stumbled
21 onto voting software used to coordinate elections.

22 That is what Konnech does, isn't it?

23 THE WITNESS: I think it's one of the
24 things they do.

25 THE COURT: Well, do they do it or not?